

EXHIBIT “A”

Matthew L. Owens, Esquire
 2595 Interstate Drive, Suite 101
 Harrisburg, PA 17110
 (717) 909-2500
 Attorney ID #76080

NEDAL MORAD and ASHRAF MUSLEH	: IN THE COURT OF COMMON PLEAS
Plaintiffs	: CUMBERLAND COUNTY, PENNSYLVANIA
	:
vs.	: NO. 13-5135 Civil
	:
MICHAEL MAXWELL and	: CIVIL ACTION- LAW
OLD DOMINION FREIGHT LINE, INC	: JURY TRIAL DEMANDED
and OLD DOMINION FREIGHT	:
Defendants,	:
	:
	:

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service
 Pennsylvania Bar Association
 PO Box 186
 Harrisburg, PA 17108
 (800) 692-7375

ADVISO

USTED HA SIDO DEMANDADO A EN CORTE. Si usted desea defenderse de las demandas que se presentan más adelante en las siguientes páginas, debe tomar acción dentro de los próximos veinte (20) días después de la notificación de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aquí en contra suya. Se le advierte de que si usted falla de tomar acción como se describe anteriormente, el caso puede proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier otra reclamación o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin más aviso adicional. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUIENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSTO A PERSONAS QUE CUALIFICAN.

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COMPLAINT

AND NOW COMES, Plaintiffs, Nedal Morad and Ashraf Musleh, as husband and wife, by and through their attorney, Matthew L. Owens, Esquire and The Law Offices of Matthew L. Owens, Esq., LLC, who file the following Complaint:

1. Plaintiff, Nedal Morad, is an adult individual residing at 3502 Beech Run Ln, Mechanicsburg, PA, 17050.
2. Plaintiff, Ashraf Musleh, is an adult individual residing at 3502 Beech Run Ln, Mechanicsburg, PA, 17050.
3. Defendant, Old Dominion Freight Lines, Inc., is a corporation doing business in the state of Pennsylvania, with an address of 500 Old Dominion Way, Thomasville, NC 27360.
4. Defendant, Michael Maxwell, is an adult individual residing at 4200 Larry Don Ln, Waco, TX, 76708.
5. Defendant, Old Dominion Freight Lines, Inc., employed Michael Maxwell when the events giving rise to this action occurred.

OPERATIVE FACTS

6. The facts and occurrences hereinafter related occurred on or about September 1, 2011 at Interstate 81, near mile marker 57.2.
7. At the aforesaid place, Plaintiff Nedal Morad was lawfully operating her vehicle.
8. Defendant was traveling at such a rate of speed that he was unable to stop his vehicle or take evasive action to avoid the Plaintiff.
9. Defendant then struck the rear of the Plaintiff's vehicle.
10. As a result of the impact, Plaintiff Nedal Morad sustained serious injuries in the accident including but not limited to cervical and lumbar strain/sprain and limited range of motion.

COUNT I

NEDAL MORAD V MICHAEL MAXWELL, OLD DOMINION FREIGHT LINE, INC., AND OLD DOMINION FREIGHT

NEGLIGENCE OF DEFENDANTS

11. Paragraphs 1 through 10 are incorporated herein by reference as if set forth fully at length hereto.
12. The aforesaid incident occurred as a result of and was proximately caused by the careless and negligent conduct of the Defendant Maxwell which consisted of the following:
 - a. Failing to exercise the degree of care required under the circumstances;
 - b. Failing to maintain a safe following distance;
 - c. Failing to maintain a proper lookout;
 - d. Failing to be highly vigilant;
 - e. Failing to adhere to and comply with general state and local vehicle operating ordinances.

13. The aforesaid accident was a direct and proximate result of the negligence of Defendant Maxwell as he failed to maintain a safe speed, a safe following distance, and a proper lookout for other vehicles on the roadway.
14. As a result of the aforesaid conduct and breach of care of the Defendant, Plaintiff Nedal Morad sustained the injuries, losses, and damages which are more fully described above, without any negligence of Plaintiff Nedal Morad contributing thereto.
15. At all times, Plaintiff Nedal Morad acted with due care and was not liable for contributory or comparative negligence.
16. Defendant Old Dominion Freight Lines and Defendant Old Dominion Freight is vicariously liable for the underlying accident and Plaintiffs injuries and damages as Defendant Maxwell was operating a vehicle owned and maintained by Defendants Old Dominion Freight Lines, Inc., and Old Dominion Freight and was a permissive driver in the course and scope of his employment at the time the accident occurred.
17. Defendants Old Dominion Freight Lines, Inc., and Old Dominion Freight are liable and/or negligent vicariously as follows:
 - a. Failing to exercise the degree of care required under the circumstances;
 - b. Failing to properly train drivers, specifically Defendant Maxwell;
 - c. Failing to monitor drivers behavior and driving habits, specifically Defendant Maxwell;
 - d. Failing to properly screen and hire drivers, specifically Defendant Maxwell; and
 - e. Failing to adhere to and comply with general state and local vehicle operating ordinances

18. As a result of the accident and the resulting injuries, the Plaintiff Nedal Morad incurred medical expenses in the treatment, medication, hospital treatment, and other miscellaneous expenses for her injuries, and will continue to incur medical expenses into the future for her injuries for which a claim is asserted to the extent recoverable.
19. As a result of the accident and resulting injuries, Plaintiff Nedal Morad sustained and will sustain losses for which the following are legally recoverable:
 - a. Past and future pain and suffering;
 - b. Past and future embarrassment, humiliation and mental anxiety;
 - c. Past and future incidental costs;
 - d. Past and future loss of life's enjoyment/pleasures;
 - e. Past and future loss of earnings/earnings capacity;
 - f. Cervical strain/sprain;
 - g. Lumbar strain/sparin; and
 - h. Limited range of motion.
20. As a result of Defendant's negligence, Plaintiff Nedal Morad has suffered great bodily pain and suffering as well as mental anxiety and nervousness.
21. As a result of the aforesaid accident, Plaintiff Nedal Morad has sustained medical expenses as she was required to obtain medical treatment at and through Hershey medical Center and Select Physical Therapy
22. As a result of the aforesaid accident, Plaintiff Nedal Morad sustained past and future pain and suffering, loss of life's pleasures, inconvenience, lost wages, and loss of earnings and/or earning capacity.

23. As a result of the Defendant's negligence, Plaintiff Nedal Morad has suffered an interruption of her daily habits and pursuits to her great and permanent detriment and loss.

WHEREFORE, Plaintiffs request Your Honorable Court to enter judgment against the Defendants in an amount in excess of the applicable arbitration limits, plus interest, costs, damages and other such relief this Honorable Court deems appropriate.

COUNT II

LOSS OF CONSORTIUM

ASHRAF MESLEH V. V MICHAEL MAXWELL, OLD DOMINION FREIGHT

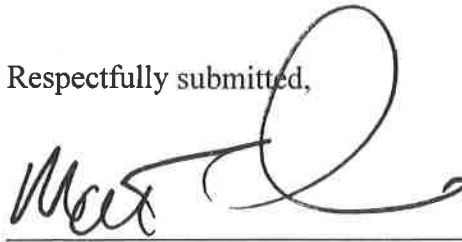
LINE, INC, AND OLD DOMINION FREIGHT

24. Paragraphs 1 through 23 are incorporated herein by reference as if set forth fully at length hereto.
25. Plaintiff Ashraf Mesleh is currently, and was at the time of the negligence of the Defendants, the legal husband of the Plaintiff Nedal Morad.
26. Plaintiff Ashraf Mesleh, as a direct and proximate result of the Defendant's negligence suffered the loss of services, society, and conjugal affection of his spouse, Plaintiff Nedal Morad for which the following are legally recoverable:
- a. Loss of performance of marital services,
 - b. Loss of love and affection,
 - c. Loss of spousal enjoyment, and
 - d. Loss of societal companionship.

WHEREFORE, Plaintiffs request Your Honorable Court to enter judgment against the Defendants in an amount in excess of the applicable arbitration limits, plus interest, costs, damages and other such relief this Honorable Court deems appropriate.

Date: 11/27/13

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matt Owens', written over a horizontal line.

Matthew L. Owens, Esquire
Attorney for Plaintiffs
2595 Interstate Drive, Suite 101
Harrisburg, PA 17110
(717) 909-2500

VERIFICATION

I hereby verify that the statements in the foregoing document are true and correct. I understand that false statements herein are made subject to penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.


Nedal Morad


Ashraf Mesleh

Matthew L. Owens, Esquire
2595 Interstate Drive, Suite 101
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	:	
	:	
	:	

CERTIFICATE OF SERVICE

AND NOW, this 2nd day of Dec., 2013, I, Sunni Elmore, an employee of the Law Offices of Matthew L. Owens, Esq., LLC hereby certify that the Plaintiff's Complaint above-captioned was mailed by United States First Class mail, postage prepaid, to:

Jay Barry Harris
Fineman Krekstein & Harris
Mellon Bank Center
1735 Market Street, Suite 600
Philadelphia, PA 19103

By: 
Sunni Elmore

Dated: 12-2-13